

The Shelby County Tennessee 9-1-1 District provides these comments regarding the E-9-1-1 Service Docket 08-51. The issue involves the FCC's requirement that a non-service initialized handset (NSI phone) must be capable of dialing 9-1-1.

The problem with this requirement is that 9-1-1 PSAPs are being inundated with various types of calls from the NSI handsets. Very few of the calls to 9-1-1 from NSI handset devices are legitimate compared to the total calls received from NSI handsets. Most calls from NSI handsets are hang-ups, bogus, prank, harassment type calls towards dispatchers and some are just accidental. Children and adults alike are becoming more knowledgeable of the fact they can call 9-1-1 from an NSI handset and the 9-1-1 center cannot trace the call, locate the caller, or in no way identify the caller.

In a way, having the capability of an NSI handset to call PSAPs for these purposes is comparable to many municipalities that installed fire alarm pull boxes in the mid 1950's until about the early 1990's. Most Cities began removing the fire alarm pull boxes by the 1990's due to the number of false alarms received from them and the cost associated with maintaining and responding to the alarms. NSI handsets are very similar citing the cost associated by adding to the 9-1-1 call load and response to any of the false calls generated by the caller.

I am providing some statistics from several PSAPs within Shelby County Tennessee and I am also listing some examples of what citizens are doing by having devices that a PSAP cannot locate, identify and or block.

On May 29, 2008 at 2254 hours a complainant called Memphis Police using an NSI handset (911)749-9470 and advised that a Memphis Police Officer had been shot at a particular location. Memphis Police PSAP dispatched 12 cars from a citywide broadcast, and this also disrupted all cars from one precinct. This turned out to be a prank call!

On May 27, 2008 at 2259 hours a female party called Memphis Fire using an NSI handset (911) 043-7250, stating her 7 year old

daughter was not breathing. Complete emergency medical protocols with CPR instructions were given, until caller stated, daughter was breathing, stayed on line all this time. Memphis Fire dispatched paramedic ambulance unit 16 and engine 16 as a first responder. They looked for the address provided for 9 minutes which turned out to be a bad address. In the mean time the caller hung up on the fire dispatcher and the call was classified as a prank call.

On May 25, 2008 at 1026 hours a party called Memphis Police using a NSI handset (911) 038-3996 who sounded like a child called and stated that my son died; then hung up.

On May 26, 2008 at 2138 hours a female called Memphis Police PSAP from an NSI handset (911)366-8425 and advised she was hit by another vehicle and needed an ambulance. Memphis police made the scene and could not locate the caller or accident and classified this call as a prank call.

On May 29, 2008 at 1904 hours a party called Memphis Police PSAP from an NSI handset (911) 176-6150 and reported a male was unconscious after a serious wound. The calling party gave bogus address and callback information and then began cursing the 9-1-1 calltakers.

On May 29, 2008 at 1926 hours a female called Memphis Police PSAP from an NSI handset (911) 456-7163 and was connected to an interpreter due to a language issue. After talking to the interpreter it was determined the party wanted the Los Angeles Police Department and was advised to call directly on a phone that had not been disconnected.

The number of calls received from NSI handsets where the calling party is abusive towards our PSAP call takers from cursing etc. is enormous. I could go on and on with the issues with NSI handsets and the abuse 9-1-1 calltakers take from some parties utilizing these devices.

The fact remains that something needs to be done. PSAPs are already inundated with requests for real emergencies much less

calls from abusive parties utilizing NSI handsets.

 

Nature and Extent of Fraudulent 911 Calls made from NSI Handsets:

The nature and extent of fraudulent 911 calls made from NSI devices are listed below for a one week period from May 25 to May 31, 2008 in Memphis & Shelby County Tennessee. Note the 9-1-1 District obtained written reports from four of the seven primary PSAPs within the county.

Total 911 calls for 7 Primary PSAPs within Shelby County Tennessee:
16,825

Total 911 calls from NSI handsets for 7 Primary PSAPs within Shelby County Tennessee: 2,534

15% of all 911 calls received were from NSI handsets at the 7 Primary PSAPs.

Memphis Police Primary PSAP

Hang-up NSI Calls 768

Prank, Bogus, Other NSI Calls 108

Accidental NSI Calls 42

Legitimate NSI Calls 51

Documented NSI Calls by Calltakers 969

Total NSI Calls per Computer Printout 2186

Shelby County Sheriff's Department PSAP

Hang-up NSI Calls 86

Prank, Bogus, Other NSI Calls 31

Accidental NSI Calls 9

Legitimate NSI Calls 0

Documented NSI Calls by Calltakers 126

Total NSI Calls per Computer Printout 258

Collierville Police Department PSAP

Hang-up NSI Calls 8

Prank, Bogus, Other NSI Calls 0

Accidental NSI Calls 4

Legitimate NSI Calls 0

Documented NSI Calls by Calltakers 12
Total NSI Calls per Computer Printout 25

Millington Police Department

Hang-up NSI Calls 6

Prank, Bogus, Other NSI Calls 0

Accidental NSI Calls 0

Legitimate NSI Calls 0

Documented NSI Calls by Calltakers 6

Total NSI Calls per Computer Printout 8

Concerns with Blocking NSI Phones:

If a procedure is use as stated below I would have no concerns whatsoever.

I have little concern by blocking them today if it is substantiated that the caller is abusive, making prank or bogus calls. In most major metropolitan cities today law enforcement agencies write tickets after responding to residential alarms after a certain number of events. Some do not respond during or after weather events such as lightning storms etc. that have been known to set off residential alarms etc. By blocking NSI handsets that have repeatedly called 9-1-1 turning in prank, bogus and harassing calls should be blocked.

Other Possible Solutions to the Problem of Fraudulent 911 calls from NSI handsets:

Require all NSI handset users who desire to have the capability to dial 9-1-1 "register" the handset so it then becomes a "9-1-1 enabled NSI handset." After registering with a carrier the handset would then only be able to dial 9-1-1, be traceable by delivering X and Y coordinates when dialing 9-1-1 and deliver a valid telephone number for the handset. If the 9-1-1 enabled NSI handset dials 9-1-1 the calltaker should have some indication that this caller is using a "registered 9-1-1 enabled handset". If the caller is abusive or is a prank call etc. the PSAP could contact the carrier that it was registered with to unregister the NSI handset so it is not able to dial 9-1-1.

By having to bring he handset in and registering it to allow it to

have the capability to call 9-1-1 for free, would cut back on some of the individuals and juveniles who use the device in an inappropriate manner.